CASWELL FILE 354B

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

PC 108102

JUN 4 1982



OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: PP#1E2515. Pirimiphos-methyl on Kiwifruit. Amendment of 2/22/82.

From: John H. Onley, Ph.D., Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Thru: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

To: Jay S. Ellenberger, Product Manager No.12
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

ICI Americas Inc. has submitted this amendment (2/22/82) in response to the deficiencies outlined in our review (10/31/81) of PP#1E2515. Each deficiency is discussed below.

Deficiency No. 1

We do not have any information on the "Attack" formulation (47.5% pirimiphosmethyl and 2.5% permethrin) in our files; for this formulation, the petitioner needs to submit a statement of formulation that clearly defines the nature and amount of each ingredient, both active and inert. Also, a proposed label for the use of "Attack" on kiwifruit in New Zealand should be submitted.

Petitioner Response to Deficiency No. 1.

The petitioner has submitted a proposed label for the intended use on kiwifruit; the label is in agreement with the instructions discussed in the "Proposed Use" section of our 10/31/81 review of PP#1E2515. Also, the petitioner has submitted a statement of formulation which defines the nature and amounts of each ingredient in the "Attack" product.

Our Comments/Conclusions on the Petitioner's Response to Deficiency No. 1.

RCB concludes that the proposed label is clear, and the inert ingredients in the "Attack" formulation have been cleared under 180.1001(a). Deficiency No. 1 has been resolved.

Deficiency No. 2.

The petitioner has anticipated that the U.S. Government will receive a letter from the goverment of New Zealand lending its support to this petition, confirming the agronomic value plus proposed use patterns for the product, and indicating that registration in New Zealand will be forthcoming once adequate assurances have been obtained of the acceptability to major importing countries of residues in the treated crops. Such a letter has not yet been received. We will need such written assurance from the government of New Zealand confirming the proposed usage and the intent to register.

Petitioner's Response to Deficiency No. 2.

The required letters (from Second Secretary P.R. Withers to Mr. Ellenberger - 12/9/82 and 2/22/82) from the government of New Zealand have been submitted in the present petition.

Our Comments/Conclusions on the Petitioner's Response to Deficiency No. 2.

RCB concludes that Deficiency No. 2 has been resolved.

Method Trial Requirement

A conclusion on the availability of an enforcement method for the parent compound, pirimiphos-methyl, for kiwifruit depends upon the outcome of the method trial that is presently in progress.

Petitioner's Response to the Method Trial Requirement.

The petitioner has provided all of the standards (parent and metabolites) to our Method Trial Unit in the Benefit and Field Studies Division. The method trial is still in progress.

Our Comments/Conclusions on the Method Trial Requirement.

The resolution on the availability of adequate methodology for enforcement purpose is contingent upon a successful EPA method trial.

Recommendations

At the present time, the analytical methodology that was submitted for regulatory purposes is being evaluated by EPA Method Trial Unit. Contingent upon a successful method trial and if TOX and EFB considerations permit, RCB recommends that a 5 ppm tolerance

for the sum of residues of pirimiphos-methyl [O(2-[diethylamino]-6-methyl-4-pyrimidinyl) O:O-dimethylphosphorothioate] plus its metabolites:

O-(2[ethylamino]-6-methyl-4-pyrimidinyl) O:O-dimethylphosphorothioate,
2-(diethylamino)-6-methyl-4 (3H) pyrimidinone,
2-(ethylamino)-6-methyl-4 (3H) pyrimidinone, and
2-amino-6-methyl-4 (3H) pyrimidinone

be established on kiwifruit.

TS-769:JOnley:vg:CM#2:Rm810:X77377:6/2/82
cc:RF, Cric., Onley, Thompson, FDA, TOX, EEB, EFB, PP#1E2515
RD: Quick, 5/28/82; Schmitt, 5/28/82

# INTERNATIONAL RESIDUE LIMIT STATUS

CHEMICAL Pirimiphos-methyl PETITION NO. 1E2515 Reviewer: J. Onley

CCPR NO. 86

Codex Status

/ / No Codex Proposal Step 6 or above

Proposed U.S. Tolerances

Residue (if Step 9): Combined residues of pirimiphos-methyl, its oxygen analog and N-desethylpirimiphos-methyl expressed as pirimiphos-methyl

| Crop(s) | Limit (mg/kg) |
|---|---|
| Kiwifruit | 2 1/ |

Residue: Pirimiphos-methyl

| Crop(s) | Tol. (ppm) |
|---|---|
| Kiwifruit | 5 |

CANADIAN LIMIT

Residue:

| Crop | Limit (ppm) |
|---|---|
| None | |

MEXICAN TOLERANCIA

Residue:

| Crop | Tolerancia (ppm) |
|---|---|
| None | |

Notes: 1/ This a Step 5 proposal, and is due to be sent to governments for comments this winter.

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# 014802

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|---|---|
| **Chemical:** | **Pirimiphos-methyl (ANSI)** |
| **PC Code:** | **108102** |
| **HED File Code** | **11000 Chemistry Reviews** |
| **Memo Date:** | **06/04/82** |
| **File ID:** | **00000000** |
| **Accession Number:** | **412-03-0015** |

**HED Records Reference Center**
**09/23/2002**